

December 29, 1989

Ms. Kelly McCarty
On-Scene Coordinator
United States Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Re: Saad Site
Nashville, Tennessee

Dear Ms. McCarty:

This is in response to the letter I received on December 14, 1989, when I was in Atlanta.

I am in the process of preparing an affidavit listing the previous clients (the companies that used the facilities at 3655 Trousdale Lane, Nashville, Tennessee, which is the subject of this EPA action) of John P. Saad & Sons, Inc. This affidavit is based upon my knowledge of the activities at the site, and may be expanded in the future, as I can recall additional clients. This affidavit will be forwarded under separate cover when completed.

In regard to the order attached to the letter, I respond as follows:

In September, 1988, I assumed the debt on the mortgage of the property, for the purpose of cleaning up the property for sale. I then began to clean up the property. There were approximately 22 tanks, including holding tanks, half tanks, and underground tanks. I have cut up and disposed of all but five tanks (including the two half tanks in the ground). The contents were placed in one tank which is still there. Superior Oil took the oil to process. The small parts of the tanks were disposed of at Steiner-Liff, a scrap iron dealer in Nashville.

I have been doing all of this at my own expense. There was no spillage involved in this cleanup.

I was in the process of taking samples of the big tank, and receiving estimates to dispose of this tank, when this action was taken by the EPA in Atlanta. I was working with the State of Tennessee and had no complaints about how I was cleaning up the site. My finances, the weather, and my time did not permit me to clean up at a faster pace.

I disagree with the finding of fact that I was part operator and manager of John P. Saad & Sons, Inc. I constructed and built the tanks. I do not agree with the finding of fact that sampling by EPA showed any hazardous chemicals or oil that presents imminent and substantial endangerment to the public health or general public.

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My intention is to dispose of the waste oil, liquid and sludge as the next step. I already have the jars for the samples. I will then contact some companies that specialize in the removal and disposal of this type oil, etc.

After the removal of the liquids, I will then proceed with the dismantling and disposal of the remaining tanks and drums.

All of the cleanup and containment is dependent upon my finances and the weather. It is estimated that the cost is approximately \$3,000 to process the waste, plus \$2,000 to dispose of the tanks. The digging of the trench and uncovering buried drums is approximately \$1,000.

It is estimated that this will take me approximately three to four months.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ellis Sand", written over the typed name.

Ellis Sand
5831 Pettus Road
Nashville, TN 37013

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